

From: [Wright, Jeff](#)
To: [Gary Moore/R6/USEPA/US@EPA](#)
Cc: [Bordelon, David](#)
Subject: RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions
Date: 01/18/2013 09:19 AM

Gary –

I would go ahead and run the TCLP and TPH analyses. If the samples pass TCLP, land ban criteria will not apply. If not, the 90% reduction (or 10x UTS) may be difficult to meet.



Jeff Wright, CHMM
Weston Solutions, Inc.

an employee-owned company

13702 Coursey Blvd.,
Bldg #7, STE A
Baton Rouge, LA 70817

(225) 297-5415 Direct
(225) 278-8406 Cell

Jeff.Wright@westonsolutions.com

From: Moore.Gary@epamail.epa.gov [mailto:Moore.Gary@epamail.epa.gov]
Sent: Thursday, January 17, 2013 11:26 PM
To: Wright, Jeff
Subject: RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

Jeff:

My only questions, should we do TPH, TCLP on the samples taken out of the pits. This will be additional data to make sure that we do or don't have a haz waste now and when we complete the solidification.

I am also wondering if we should use the land ban criteria or if that would be too stringent for us to meet after solidification/stablization.

Thanks

Gary Moore
Federal On-Scene Coordinator
EPA Region 6
Cell: 214-789-1627
Work: 214-665-6609
email: moore.gary@epa.gov

From: "Wright, Jeff" <Jeff.Wright@WestonSolutions.com>
To: Gary Moore/R6/USEPA/US@EPA
Cc: "Bordelon, David" <David.Bordelon@WestonSolutions.com>
Date: 01/17/2013 04:29 PM
Subject: RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions



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I would recommend the following:

- We will need to have characterization analysis conducted on the Treatability samples which include; pH, Bulk Density, Solids and Water Content, Total Oil and Grease and SPLP SVOCs and Metals.
- Use the UCS criterion of 10 psi, 25 psi and 50 psi as the primary goals. Once these are achieved analyze the treated material for permeability and SPLP.
- Regarding the reagents, the recommended formulations from the Malone site included Portland Cement, quicklime and fly ash. At the Bayou Trepagnier site they used a mixture of cement and lime (10%) and a separate 50:50 mixture of fly ash and bed ash at 10-15%. I would suggest using the same ones. We could begin my suggesting using the exact same ratios as above but the lab may have some suggestions after they run the characterization analysis (Solids and water content will probably influence the mixture ratios).

The lab had also requested COC concentration reduction goals along with the permeability criteria. We could use the SPLP analysis and permeability tests as supplemental data and not treatability test criteria. John Halk stated that they did not obtain SPLP or permeability data during their solidification/stabilization process. I think it would be a good idea to get this data and see where it stands after reaching the 10, 25 and 50 psi UCS. If it looks like the SPLP and/or permeability results are a concern we could adjust the reagent formulations or you may determine that this is not a viable clean up option without conducting additional tests.



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13702 Coursey Blvd.,
Bldg #7, STE A
Baton Rouge, LA 70817

(225) 297-5415 Direct

(225) 278-8406 Cell

Jeff.Wright@westonsolutions.com

From: Moore.Gary@epamail.epa.gov [<mailto:Moore.Gary@epamail.epa.gov>]

Sent: Thursday, January 17, 2013 3:28 PM

To: Wright, Jeff

Cc: Bordelon, David

Subject: RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

Jeff:

Do you have recommendations for the information that they would need, at this point I don't.

Thanks

Gary Moore
Federal On-Scene Coordinator

EPA Region 6
Cell: 214-789-1627
Work: 214-665-6609
email: moore.gary@epa.gov

From: "Wright, Jeff" <Jeff.Wright@WestonSolutions.com>
To: Gary Moore/R6/USEPA/US@EPA
Cc: "Bordelon, David" <David.Bordelon@WestonSolutions.com>
Date: 01/17/2013 12:39 PM
Subject: RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

I've looked over that report and noted the following observations:

1) The two primary objectives were for the treated material to meet requirements for either RCRA Subtitle C- or RCRA Subtitle D-equivalent on-site disposal cell

Subtitle C requirements - UCS greater than 25 psi with no free liquids

Subtitle D requirements - UCS greater than 50 psi with no free liquids, permeability less than 1×10^{-6} cm/sec and SPLP contaminant concentrations less than Texas Class 3 groundwater standards

2) They were able to meet the Subtitle C requirements but none of their formulations met the Subtitle D requirements.

It is stated that hazardous contaminants are present in the samples (i.e. benzene, methylene chloride); however they still provide recommended formulations to meet Subtitle C requirements. Would be interested to see if they went with the Subtitle C requirements.

3) Using cement, quicklime and fly ash, the average volume increase was around 14%

I also spoke with John Halk again today. He reconfirmed that at the Bayou Trepagnier site their solidification/stabilization criteria was 8 psi UCS. No SPLP analyses were conducted. He does not seem too concerned about SPLP, but it would probably be a good idea to have that data. May be we should set our UCS criteria at 10, 25 and 50, which would correspond to the Subtitle C and D requirements.

I would like to go ahead and request a Treatability proposal from the lab (which we will need for any future work plan). Again the only information they need is the number of reagents we would like to use; the COC concentration reduction goals, along with the UCS and permeability criteria. This would provide a good cost quote.



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(225) 278-8406 Cell
Jeff.Wright@westonsolutions.com

From: Moore.Gary@epamail.epa.gov [<mailto:Moore.Gary@epamail.epa.gov>]

Sent: Wednesday, January 16, 2013 3:26 PM

To: Wright, Jeff

Subject: RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

Get the report off of epaosc.net. Let me know when you get it so I can delete it.

[Malone TS Final Report.pdf](#)

Gary Moore
Federal On-Scene Coordinator
EPA Region 6
Cell: 214-789-1627
Work: 214-665-6609
email: moore.gary@epa.gov

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